

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION**

| | | |
|----------------------------------|---|---------------------------|
| CHANDRA L. BERRY |) | |
| |) | |
| Plaintiff, |) | |
| v. |) | No. 2:18-cv-02721-SHL-dkv |
| |) | |
| |) | |
| SPECIALIZED LOAN SERVICING, LLC, |) | |
| BANK OF NEW YORK MELLON TRUST |) | |
| COMPANY, and |) | |
| CORELOGIC CREDCO, |) | |
| |) | |
| Defendants |) | |

ANSWER OF CORELOGIC CREDCO

Defendant CoreLogic Credco (“Credco”) submits its Answer to Plaintiff Chandra Berry’s Complaint.

ANSWER

1. The statements in this paragraph are legal statements to which no response is necessary.
2. Credco is still investigating the allegations in this paragraph, but upon information and belief, it appears that Credco’s service was used by Specialized Loan Servicing, LLC to access Ms. Berry’s credit information.
3. The statements in this paragraph are legal statements to which no response is necessary.
4. The statements in this paragraph are legal statements to which no response is necessary.
5. Denied.

6. The allegations in this paragraph are not directed at Credco and therefore do not require a response. For further answer, Credco is without sufficient information or knowledge to admit or deny the allegations this paragraph.
7. The allegations in this paragraph are not directed at Credco and therefore do not require a response. For further answer, Credco is without sufficient information or knowledge to admit or deny the allegations this paragraph.
8. The allegations in this paragraph are not directed at Credco and therefore do not require a response. For further answer, Credco is without sufficient information or knowledge to admit or deny the allegations this paragraph.
9. The allegations in this paragraph are not directed at Credco and therefore do not require a response. For further answer, Credco is without sufficient information or knowledge to admit or deny the allegations this paragraph.
10. The allegations in this paragraph are not directed at Credco and therefore do not require a response. For further answer, Credco is without sufficient information or knowledge to admit or deny the allegations this paragraph.
11. The allegations in this paragraph are not directed at Credco and therefore do not require a response. For further answer, Credco is without sufficient information or knowledge to admit or deny the allegations this paragraph.
12. The allegations in this paragraph are not directed at Credco and therefore do not require a response. For further answer, Credco is without sufficient information or knowledge to admit or deny the allegations this paragraph.

13. The allegations in this paragraph are not directed at Credco and therefore do not require a response. For further answer, Credco is without sufficient information or knowledge to admit or deny the allegations this paragraph.
14. The allegations in this paragraph are not directed at Credco and therefore do not require a response. For further answer, Credco is without sufficient information or knowledge to admit or deny the allegations this paragraph.
15. The allegations in this paragraph are not directed at Credco and therefore do not require a response. For further answer, Credco is without sufficient information or knowledge to admit or deny the allegations this paragraph.
16. The allegations in this paragraph are not directed at Credco and therefore do not require a response. For further answer, Credco is without sufficient information or knowledge to admit or deny the allegations this paragraph.
17. Credco is still investigating the allegations in this paragraph, but upon information and belief, it appears that Credco's service was used by Specialized Loan Servicing, LLC to access Ms. Berry's credit information. The remaining allegations in this paragraph are not directed at Credco and therefore do not require a response.
18. Denied.
19. The allegations in this paragraph are not directed at Credco and therefore do not require a response. For further answer, Credco is without sufficient information or knowledge to admit or deny the allegations this paragraph.

20. The allegations in this paragraph are not directed at Credco and therefore do not require a response. For further answer, Credco is without sufficient information or knowledge to admit or deny the allegations this paragraph.
21. Credco is without sufficient information or knowledge to admit or deny the allegations this paragraph.
22. Credco is without sufficient information or knowledge to admit or deny the allegations this paragraph.
23. Credco is still investigating the allegations in this paragraph, but upon information and belief, it appears that Credco's service was used by Specialized Loan Servicing, LLC to access Ms. Berry's credit information. Credco is without sufficient information or knowledge to admit or deny the remaining allegations this paragraph.
24. The allegations in this paragraph are not directed at Credco and therefore do not require a response.
25. The allegations in this paragraph are not directed at Credco and therefore do not require a response.
26. The allegations in this paragraph are not directed at Credco and therefore do not require a response.
27. The allegations in this paragraph are not directed at Credco and therefore do not require a response.

28. The allegations in this paragraph are not directed at Credco and therefore do not require a response.
29. Denied.
30. Denied.
31. The allegations in this paragraph are not directed at Credco and therefore do not require a response.
32. The allegations in this paragraph are not directed at Credco and therefore do not require a response.
33. The allegations in this paragraph are not directed at Credco and therefore do not require a response.
34. Insofar as any allegations have not been admitted, denied, or explained, such allegations are denied generally here as if they had been denied specifically.
35. Credco denies that Plaintiff is entitled to any of the relief she seeks in the Civil Warrant form.

AFFIRMATIVE DEFENSES

Credco may rely upon the following affirmative defenses:

1. The Complaint fails to state a claim upon which relief can be granted against Credco.
2. Credco may rely upon the bona fide error defense under the FCRA.

Respectfully submitted,

s/ Kavita G. Shelat

Kavita Goswamy Shelat (#29388)
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Attorney for CoreLogic Credco

CERTIFICATE OF SERVICE

I hereby certify that the foregoing will be served via U.S. Mail on November 7, 2018 to:

Chandra L. Berry
8563 Griffin Park Drive
Cordova, TN 38018

s/ Kavita G. Shelat
